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February 17, 2012

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Hon. Michael A. Hammer, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King, Jr. Federal Building & U.S.
Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Moulton v. LG Electronics, Inc. et al.
Civil Action No. 2:11-cv-4073-JLL

Dear Judge Hammer:

We are counsel to Defendants LG Electronics, Inc. and LG Electronics USA, Inc. (“Defendants”) in the above-captioned matter. We submit this letter in response to Your Honor’s order dated February 7, 2012.

Defendant LG Electronics USA, Inc. filed a motion to dismiss Plaintiff Deborah Moulton’s class action complaint (the “Complaint”) on February 3, 2012 (the “Motion to Dismiss”). In its Motion to Dismiss, Defendant LG Electronics USA, Inc. seeks an order dismissing the Complaint in its entirety with prejudice.

Plaintiff’s opposition to the Motion to Dismiss is currently due on February 21, 2012. On February 15, 2012, Plaintiff filed a consent order seeking to extend the time that it has to respond up to and including March 13, 2012.

It is Defendants’ understanding that Plaintiff intends to file an amended complaint rather than oppose Defendant LG Electronics USA, Inc.’s Motion to Dismiss. In light of this, and in light of the pendency of the current Motion, Defendants respectfully request that the initial conference currently scheduled for April 13, 2012 be postponed until such time as any motions to dismiss the current or amended Complaint have been decided by the Court.

Respectfully submitted,



Christopher N. Tomlin

DMEAST #14622360 v1

A PA Limited Liability Partnership | Steven W. Suflas, Managing Partner

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cc: Counsel of Record (via ECF)